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DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

350 Ottawa Avenue, N. W. Grand Rapids, Michigan 49503

September 30, 1983



Mr. Curt Kemppainen Kent County Department of Public Works 1500 Scribner, N.W. Grand Rapids, MI 49503

Re: Plainfield Township Landfill

Kent County #41-0009

Dear Mr. Kemppainen:

This correspondence is intended to formalize the Department's position relative to ground and surface water contamination resultant from the 10 Mile Road Landfill and also to confirm the meeting between Department staff and the D.P.W. of September 22, 1983.

During the months of February, June, and August of 1983, the Department of Natural Resources staff collected ground and surface water samples from various monitoring wells and outfalls at the Plainfield Landfill. During each of these events the Department of Public Works also collected samples from each of the sampling points. Although some anomalies exist in the reported values for various parameters, the analytical results of the samples collected by both the D.N.R. and the D.P.W. confirm the fact that the facility is adversely affecting a groundwater resource and that volatile organic compounds are being discharged from the outfalls, constituting violations of Act 245, P.A. 1929, as last amended; Act 641, P.A. 1978, as last amended; and the limitations established pursuant to your National Pollutant Discharge Elimination System Permit.

As discussed during our September 22, 1983 meeting, it is the Department's position that a remedial action plan must be developed to address all aspects of the environmental degradation which is occurring at the site, which includes the ongoing discharge at the underdrain outfalls, the groundwater contamination, and physical closure of the site.

A. Outfalls 004 and 005

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Based upon the analytical results, the outfalls have consistently shown the highest level and most diverse components of volatile organic compounds, particularly in outfall 004. Subsequently, we feel that a plan must be developed to capture and treat the contaminated water to the degree necessary to comply with the discharge limitations of your N.P.D.E.S. Permit.

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B. Groundwater

The results of the groundwater monitoring wells show that the concentrations of contaminates in the monitoring wells are continuing to increase with each successive sampling, particularly along the western perimeter of the site. In addition, the contaminated groundwater is continuing to migrate and may have already left the property. Therefore, it will be necessary to install additional monitoring wells to determine the horizontal and vertical extent of contamination and ultimately develop a system to capture and treat the contaminated groundwater or to contain the plume on site. In conjunction with this it is appropriate to thoroughly evaluate the landfill system for possible avenues for escape of the contaminates and provide a mechanism to abate any further discharge.

As agreed during the meeting, you will provide the available information (top casing elevation, static water levels, well screen locations) relative to the existing monitoring wells and also a proposed plan for locating additional monitoring wells along the westernperimeter of the property. The proposed locations will be provided to DNR by October 21, 1983.

C. Closure

Based upon the fact that the groundwater has been impacted as a result of the landfill operation, the site must be properly closed. The Department may consider allowing operation of the facility for a limited period of time through an agreement document for addressing remedial actions and closure to allow acceptable grade achievement and to minimize surface water runoff from entering the refuse mass, providing the terms are acceptable to the Department.

Please review the contents of this correspondence and provide your response and proposed timetable for implementation to this office by October 14, 1983. During the interim, if you have any questions or wish to discuss this matter further, feel free to contact this office.

Sincerely,

GROUNDWATER QUALITY DIVISION

Gerard J. Hey't

District Supervisor

GJH:bjc

cc: T. Work

W. Bradford

R. Przybysz

J. Kennedy